REMARKS

This paper is presented in response to the non-final official action dated June 19, 2005, wherein the examiner indicated that the previously submitted paper, entitled "Reply to Paper No. 1" (hereinafter "the previous reply paper"), has been deemed non-responsive for failure to present arguments in support of the patentability of the claims presented therein. The previous reply paper was submitted in response to an official action dated November 3, 2004, in which (i) the specification was objected to under 35 U.S.C. §112, first paragraph, (ii) now-cancelled claims 1-40 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite, and (iii) now-cancelled claims 1-40 were rejected under 35 U.S.C. §102(e) as being anticipated by Chang et al. U.S. Patent No. 5,958,016 ("Chang").

I. Substitute Specification

In response to the objection to the specification under 35 U.S.C. §112, first paragraph, the applicant submits concurrently herewith a substitute specification to correct matters of a formal nature and set forth the application in proper idiomatic English. The substitute specification is submitted pursuant to 37 C.F.R. 1.125 with (i) one copy having markings showing all of the changes relative to the immediate prior version of the specification, (ii) one clean copy without markings, and (iii) a statement that the substitute specification includes no new matter.

Accordingly, the applicant respectfully requests reconsideration and withdrawal of the objection to the specification under 35 U.S.C. §112, first paragraph.

II. The Claim Rejections for Indefiniteness are Moot

Claims 41-66 are pending and at issue in the application. The previous reply paper presented amendments cancelling claims 1-40 and adding claims 41-56 to overcome the rejections under 35 U.S.C. §112, second paragraph. Claims 41-56 have been further amended herein to address matters of a formal nature and to better conform the claims to standard U.S. format. Accordingly, no new matter has been added by the foregoing amendments. It is further respectfully submitted that the amendments to claims 41-66 render moot the rejections under 35 U.S.C. §112, second paragraph. Reconsideration is requested.

Support for the amendments made in the previous reply paper may be found at the system level in Figs. 1A, 2, and 4, and at the unit level in Figs. 6 (access unit), 11

(management unit), and 14 (application unit), together with the textual descriptions associated therewith. Generally speaking, Figs. 6, 11 and 14 depict access, management, and application units having respective modules with specified characteristics, such as the information exchange modules (NSM). With specific regard to the access unit, please see, for example, the textual description associated with Fig. 6, which identifies the characteristics of the NSM, as well as Table 4, which identifies exemplary NSM equipment known to provide network switching functionality. Support for the management and application units may similarly be found in connection with Figs. 11 and 14, respectively.

III. Arguments in Support of the Patentability of Claims 41-66

As noted above, now cancelled claims 1-40 were rejected under 35 U.S.C. §102(e) as being anticipated by Chang. Applicants respectfully submit that claims 41-66 recite patentable subject matter over Chang for the reasons set forth below. The applicant accordingly traverses the assertions and determinations made in the official action dated November 3, 2004, for at least the following reasons.

A. Claims 41-57 recite patentable subject matter over Chang

Claim 41, as amended, and by implication claims 41-57 dependent either directly or indirectly thereon, specify an integrated information service platform system including an access unit (ACU), a management unit (MAU), and an application unit (APU), where the access, management and application units include first, second, and third network switching modules, respectively, for implementing communication switching and communications as recited in claim 41. The management unit further includes a processing module implementing unified management and control on operations of every part of the platform system.

It is respectfully submitted that Chang fails to disclose or suggest a system having a management unit with a network switching module, much less a management unit further including a processing module implementing unified management and control on operations of every part of the platform system, as required by claims 41-57.

Chang teaches a system for enabling users to manage their telephone services via the Internet using a user terminal running Internet browser software (see, e.g., Chang, col. 4, lines 52-59). Chang generally discloses a mechanism to support customer (i.e., subscriber)

interaction with various network management systems 24, thereby providing usage and billing related information regarding the telephone services (see Chang, col. 11, lines 9-14 and col. 14, lines 56-62).

Subscribers access these management systems via a secure access platform 25 having a firewall 251, a trusted network system (TNS) 253, and a web service management system (WSMS) 255. The firewall and the TNS perform security functions, and the WSMS provides "service management interface functions for telephone customers accessing the system" (see Chang, col. 14, lines 39-48). While the firewall and the TNS include Internet routers and computers executing proxy server and security applications, the computer system serving as the WSMS 255 runs an operating system and applications such as a database application for accessing stored customer service profiles and a web service management application 257 (see Chang, col. 16, lines 1-4). Using these applications, the WSMS 255 communicates with the above-referenced network management systems (see Chang, col. 16, lines 12-13).

In contrast to the integrated information service platform system recited in claim 41, the web service management system (WSMS) of Chang fails to disclose or suggest a management unit having a network switching module, as required by claim 41. As described by Chang, the WSMS 255 is essentially a software application, such as a database application (i.e., the web service management system application 257), rather than a network switching module.

Furthermore, the WSMS of Chang fails to disclose or suggest a management unit having a processing module implementing unified management and control on operations of every part of the platform system, as required by claim 41. Instead, the WSMS is a network node that "provides a subscriber accessible database of the service control information that the subscriber can review and/or change" (see Chang, col. 19, lines 59-62). The functionality provided by the database neither implements unified management and control, nor communication switching, as recited in claim 41 in connection with the processing and network switch modules of the management unit, respectively.

For these reasons, it is respectfully submitted that Chang fails to disclose or suggest a management unit, as recited in claim 41. It follows that claim 41 and, by implication, claims 42-57 dependent thereon, are not anticipated by Chang.

B. Claims 58-66 recite patentable subject matter over Chang

Claim 58, as amended, and by implication claims 59-66 dependent either directly or indirectly thereon, specify a method of providing integrated information service where (i) a service request inputted via a transmission network from a user terminal is converted to data based on IP protocol, and (ii) processing results based on IP protocol are converted into a data format identifiable to the user terminal.

It is respectfully submitted that the telephone customer interaction system of Chang neither discloses nor suggests (i) converting a service request inputted via a transmission network from a user terminal to data based on IP protocol, or (ii) converting results based on IP protocol into a data format identifiable to the user terminal.

As set forth above, Chang discloses a system to support customer interaction with a network to manage telephone services. To that end, the user terminal has a web page interface provided via a browser (see, e.g., Chang, Abstract). FIG. 2 of Chang shows the user terminal connected to the secure access platform 25 of the system via the Internet 27, which uses TCP/IP protocol to communicate data between the terminal and the secure access platform 25 (see, e.g., Chang, col. 12, lines 50-63).

To the extent the system disclosed by Chang inputs a service request via a transmission network from a user terminal, the request is inputted via the Internet. But because the Internet uses IP protocol, it follows that there would be no need to convert the service request to data based on IP protocol, as recited in claim 58. It is accordingly submitted that Chang fails to disclose or suggest the desirability of converting a service request inputted via a transmission network from a user terminal is converted to data based on IP protocol, as required by claim 58.

For similar reasons, to the extent that the system disclosed by Chang returns "results based on IP protocol," Chang fails to disclose or suggest converting such results as required by claim 58. In short, no conversion is necessary in Chang because the user terminal in Chang relies on IP protocol for communication.

For these reasons, it is respectfully submitted that Chang fails to disclose or suggest a method where a service request and results are converted as recited in claim 58. It follows that claim 58 and, by implication, claims 59-66 dependent thereon, are not anticipated by Chang.

IV. Conclusion

For the foregoing reasons, it is submitted that all pending claims 41-66 are allowable over the cited reference, and an indication to that effect is solicited.

Should the examiner wish to discuss the foregoing or any matter of form in an effort to advance this application toward allowance, he or she is urged to telephone the undersigned at the indicated number.

Dated: September 15, 2005

Respectfully submitted,

By _____

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